



LOCAL PLAN PUBLICATION STAGE REPRESENTATION FORM

North Hertfordshire Proposed Submission Local Plan

Please return this form to North Hertfordshire District Council either by email to : local.plans@north-herts.gov.uk or by post to: Strategic Planning and Projects Group, NHDC, PO Box 480, M33 0DE

The deadline for receipt of representations is **30 November 2016**. Late representations will not be considered.

This form has two parts-

Part A – Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details

2. Agent Details

**If an agent is appointed, please complete only the Title, Name and organisation boxes below but complete the full contact details the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	Miles	<input type="text"/>
Last Name	Maxwell	<input type="text"/>
Job Title <i>(Where relevant)</i>	Chairman	<input type="text"/>
Organisation <i>(Where relevant)</i>	Ickleford Parish Council	<input type="text"/>
Address Line 1	c/o 1 Freewaters Close	<input type="text"/>
Line 2	Ickleford	<input type="text"/>
Line3	Hitchin	<input type="text"/>
Line 4	Herts	<input type="text"/>
Post Code	SG5 3TQ	<input type="text"/>
Telephone Number	07920 568928	<input type="text"/>
Email Address <i>(Where relevant)</i>	miles.maxwell@icklefordpc.com	<input type="text"/>

Part B - Please use a separate sheet for each representation

It is recommended that you read the Guidance Notes provided for an explanation of the terms used in this form.

Name or Organisation:

1. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Site

2. Do you Consider the Local Plan is: [Note – this section is not applicable online as we support this site]

(Please tick as appropriate)

i)	Legally Compliant	Yes	<input type="text"/>	No	<input type="text" value="x"/>
ii)	Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
If No, which of the Soundness tests does it fail?					
	Positively prepared				<input type="text" value="x"/>
	Justified				<input type="text" value="x"/>
	Effective				<input type="text"/>
	Consistent with National Policy				<input type="text" value="x"/>
iii)	Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

3. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst Ickleford Parish Council does not object to the inclusion of this site in the Local Plan, we would be grateful if the following concerns could be taken into account alongside those raised for the Ickleford sites IC1, IC2 and IC3.

Environmental Objectives

The Draft Sustainability Appraisal of North Hertfordshire Proposed Submission Local Plan cites a number of Environmental Objectives:

- ENV1 - Direct development towards the most sustainable locations which seek to



maintain the existing settlement pattern

- ENV3 – Protect, maintain and enhance the historic and natural environment, its network of open spaces and rural landscapes

The Parish Council believes the Local Plan has not been positively prepared in relation to the following environmental objective:

1. To increase the housing stock of a village by 40% (the net effect of IC1, IC2, IC3 and LS1), with minimal local resources and poor public transport links contravenes ENV1; this is not sustainable and does not maintain the existing settlement pattern.

We consider that the Local Plan has not been positively prepared and is not justified in relation to the following environmental objective:

1. The excessive development proposed for Ickleford damages our historic and natural environment and our open and rural spaces, and therefore contravenes ENV3.

Traffic

Traffic throughout the District is acknowledged as being already problematic. Table 17 of the Draft Sustainability Appraisal states: 'The density of traffic on the principal road network is high and increasing but the rural nature of the District makes the provision of sustainable travel modes more challenging'.

We consider that the Local Plan has not been positively prepared for the following reasons:

1. 13.158 of the Local Plan indicates no specific mitigation works required for the Ickleford road network according to NHDC transport modelling. We believe this to be flawed. Extensive current and proposed development is planned within the neighbouring authority of Central Bedfordshire, against which Ickleford abuts. For example, the town of Arlesey (4 km north of Ickleford) is earmarked for approximately 1,000 new dwellings, and the site at RAF Henlow (2km north of



Ickleford) will close by 2020 with 780 new dwellings being proposed for the site. The attached Department for Transport National Travel Survey NTS9902 indicates 1.31 vehicles per household in the East of England in 2014/15, and a rural town/ fringe figure 19% higher than the average. For just these two sites, an additional 2774 additional vehicles ($1.31 + 19\% = 1.56$ per household $\times 1780$) can reasonably be predicted. A significant number of these will flow through Ickleford (A600 and Arlesey Road/ Turnpike Lane), adding to an already-strained road network.

We believe that the definition of traffic problems used by NHDC is too conservative. Thus, the Local Plan Transport Modelling Report - Draft July 2016 states: 'A problem with network operation was defined as a location where the model shows there are still more than 100 vehicles queuing at the end of the AM or PM peak hour.' A more realistic definition would identify more traffic problem sites, possibly including some in Ickleford.

2. In addition, Central Bedfordshire has yet to publish its Local Plan, but it is inevitable that the latter will recommend yet further housing, traffic from which will affect Ickleford. Moreover, Table 34 of the Draft Sustainability Appraisal acknowledges this: 'Given the early stage of the [Central Bedfordshire] Plan preparation process, it is not possible to identify specific cumulative impacts'. This is particularly problematic for a village such as Ickleford which is adjacent to the county/ authority boundary.

These major traffic factors have been overlooked, and therefore, we believe NHDC transport modelling to be fundamentally flawed.

3. The Appraisal Framework of the Draft Sustainability Appraisal suggests that developments should 'avoid exacerbating local traffic congestion'. The traffic modelling prepared by AECOM in the North Hertfordshire Local Plan Model Testing document attempts to quantify the increase in traffic resulting from the Local Plan. We do not believe these figures are credible. For example, for IC3 the proposed 150 additional dwellings are projected to lead to an additional 63 trips in the morning and an additional 33 trips in the afternoon – see above data on projected vehicles per



household based on Department for Transport NTS9902. Therefore, we do not believe the objective of the Draft Sustainability Appraisal can be met.

Air and noise pollution associated with increased traffic

The Parish Council believes that the Local Plan has not been positively prepared for the following reasons:

1. A 40% increase in the population of Ickleford will lead to a similar rise in car journeys. This will be dwarfed by the overall increases in traffic associated with the wider NHDC Local Plan, and the likely increases associated with the embryonic Central Bedfordshire Local Plan. The majority of Ickleford residents live within 25 metres of the two village thoroughfares (A600 and Arlesey Road/ Turnpike Lane), and will be subject to likely environmental health impacts due to traffic pollutants.
2. NHDC Policy D4 on air quality requires consideration to be given to potential impact on local air quality. This does not appear to have been done, and even if it had, it would likely be based on the flawed transport modelling mentioned above.
3. The Appraisal Framework of the Draft Sustainability Appraisal suggests that developments should achieve good air quality and reduce ambient noise, especially from traffic. We do not believe either of these objectives can be met. Importantly, Table 17 of the Draft Sustainability Appraisal supports our assertion: 'Noise from air and road transport has a significant effect on quality of life in the District. Proposed developments will have significant additional impacts'.

We consider that the Local Plan is not consistent with national policy for the following reason:

1. The NPPF (Para 124) states 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the cumulative impacts on air quality from individual sites in local areas.'



Lack of prior consultation

1. The Parish Council believes the Local Plan is not legally compliant as sites IC3 and LS1 were added to the Proposed Submission Local Plan at a very late stage. Therefore, there was no opportunity for public consultation on these sites.

Summary of key points for online submission:

- Environmental Objectives
- Traffic
- Air and noise pollution associated with increased traffic
- Lack of prior consultation

[Note – there is no opportunity to include proposed modifications to the Local Plan for this site as we support its inclusion in the Plan. Information from the proposed modifications section has therefore been included here in our online submission to ensure it is taken into account when all the sites for Ickleford (including LS1) are considered:]

As noted in the supporting letter, the Parish Council would like to propose a reduced number of houses for site IC3 which would only be located on the South side of BR15 to help make the Local Plan sound. This proposal would be subject to the satisfactory resolution of the sewerage problem in Ickleford, as mentioned above, and would remove the land that is currently being farmed from the Plan. A smaller development on IC3 might help address some of the concerns listed with respect to Environmental objectives ENV1, ENV2 and ENV3.

Additionally, as NHDC has not accounted for any impact associated with the Central Bedfordshire Local Plan, we believe a 50% reduction in the number of houses proposed for site IC3 would cause a significant reduction in the number of cars from this site. This would allow for an increase in the capacity of the Hitchin highway system, currently recognised as being under stress, to cope better with traffic coming from any new developments in Central Bedfordshire, and also from site LS1 should this be developed.

(Continue on a separate sheet if necessary)

NORTH HERTFORDSHIRE DISTRICT COUNCIL



Please note your representation should cover concisely all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

1. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

2. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To provide greater context to our objections and observations, and allow the inspector to seek clarification on any points.

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

3. Do you wish to be notified when the Local Plan is submitted?

Yes, I do wish to be notified

No, I do not wish to be notified

4. Signature: Date: